

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF NORTH DAKOTA

UNITED STATES OF AMERICA,

Plaintiff,

v.

ROSS SYLVESTER ELENDU,

Defendant.

Case No. 3:24-CR-00142

**JOINT MOTION FOR  
CONTINUANCE**

The United States of America, by Mac Schneider, United States Attorney for the District of North Dakota, and Matthew D. Greenley, Assistant United States Attorney, Defendant, ROSS SYLVESTER ELENDU; and Defendant's counsel, Rhi Gorham, jointly move the Court under 18 U.S.C. § 3161(h)(7)(A) to continue the jury trial in the above captioned matter, currently set for October 22, 2024, for a period of at least 60 days to permit the parties to satisfy discovery obligations and prepare for trial.

1. The Defendant is currently on release based on the stipulation of the parties.
2. To date, there are approximately 8000 Bates stamped pages of discovery, and the United States intends to disclose additional discovery.
3. The United States will seek a protective order to disclose additional certain tax records to the Defendant.
4. The parties have been diligent in preparation for trial and jointly seek a continuance to further prepare for trial.
5. The parties agree that the ends of justice served by granting this continuance will outweigh the best interests of the public and the defendant in a speedy trial.
6. The Defendant's written consent to a continuance is attached to this motion.

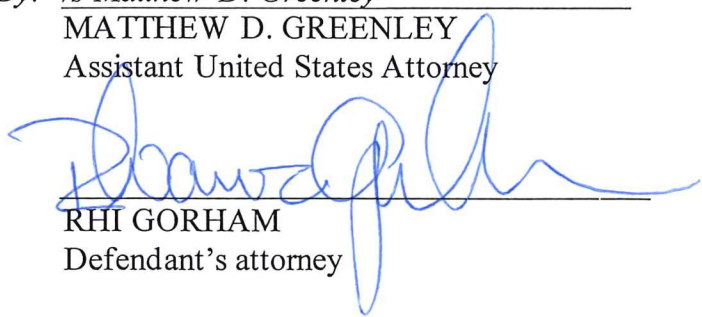
MAC SCHNEIDER  
United States Attorney

Dated: October 7, 2024

By: /s Matthew D. Greenley

MATTHEW D. GREENLEY  
Assistant United States Attorney

Dated: 10/7/24

  
RHI GORHAM  
Defendant's attorney